

ANTI – SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY FOLDER: HUMAN RESOURCES

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1.0 INTRODUCTION

- 1.1 This statement sets out National Fostering Group’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.
- 1.2 As part of the social care and education sector the Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. It is the responsibility of line managers to ensure that staff members are aware of and understand this policy and any subsequent revisions.
- 1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

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2.0 DEFINITIONS

Word / Term	Descriptor
Modern Slavery	The recruitment, movement, harbouring or receiving of children, or adults through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.
Human Trafficking	The action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labour or sexual exploitation.

3.0 PURPOSE

- 3.1 This policy sets out the Groups absolute commitment to preventing slavery and human trafficking activities and to ensure that its supply chains are free from slavery and human trafficking.

4.0 RESPONSIBILITIES

- 4.1 All Employees are collectively and personally responsible for the communication, understanding and practical application of this policy.
- 4.2 The Group Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the Group.
- 4.3 All Group services are subject to rigorous operational statutory regulation with compliance measured and audited by Ofsted (England), Care Quality Commission (England), Care Inspectorate (Scotland), Care Inspectorate (Wales) and Regulation and Quality Improvement Authority (Northern Ireland).
- 4.4 To maintain a focus on quality, our Group directly employs an extensive internal quality assurance and compliance team. In addition, the Group retains an externally chaired Quality Committee reporting directly to its Main Board.
- 4.5 This Policy will be made available to all Employees on the Group Cascade system, and to our supply chain and to any other interested parties upon request.

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5.0 STATEMENT OF COMMITMENT

- 5.1 The key component in all our businesses are the people employed to support our operations. Due to the nature of children’s services our recruitment processes are strict and comply fully with regulatory guidelines and safer recruitment for those working with children, and vulnerable adults.
- 5.2 Our teams are encouraged to speak up about unethical behaviour, wrongdoing or behaviours they think go against our policies and values. Direct access to our Group CEO, whistle blowing procedures and Safecall facilities supports this communication. Colleagues must notify management or Safecall as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.3 Every employee is given membership of the UK charity, NWG Network, who provide a network of projects, access resources and policies for those organisations concerned with child sexual exploitation (CSE) and/or modern slavery of children and young people.
- 5.4 Due to the nature of our businesses, we have only a modest supply chain to ensure our needs in terms of our administration, IT and management of our facilities and buildings are properly met. Our supply chain is rationalised where possible and our Finance team have oversight where appropriate.
- 5.5 It is expected that our suppliers can provide details of their own policies supporting their Anti-Slavery statements and, as a minimum, meet national laws and include human rights principles regarding child labour and bonded or forced labour.
- 5.6 We look for our supply chains to provide products that meet, where possible, ethical standards of supply (for example: Rain Forest Alliance accredited, PEFC or FSC) and sustainably certified food ingredient products that are principally UK or EU sourced). We are of the opinion our supply chain is compliant in these matters.
- 5.7 Group colleagues are also advised of the resources available on www.modernslaveryhelpline.org and the supporting helpline number: 08000 121 700. and Safecall our whistle blowing hotline.
- 5.8 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

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5.9 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6.0 POLICIES

6.1 **Recruitment/ Agency Workers Directive Policy:** The Group uses only specified, employment agencies. It is a reasonable expectation of the Group that any agency used would treat their employees in a fair manner, and in line with all relevant legislation. As a Group, we have a number of safeguards in place to ensure that we do not support any wrongful practices. These include; Promoting transparent, and open reporting; Making agencies aware of our safer recruitment practices, ensuring that the correct checks are carried out; Engage in the fair payment of rates to the agency for workers. Where the Group is made aware of any contradictions to these practices, it would look to immediately disengage with the service.

6.2 All reports will be fully investigated, and appropriate remedial actions taken and we will work closely with local authorities in ensuring our safeguarding policies and procedures dovetail with local procedures and best practice. We operate robust recruitment practices, our employment offers are made conditional upon receipt of satisfactory references, confirmation of eligibility to work in the UK (birth certificate/ passport), and confirmation of national insurance number amongst other criteria.

6.3 **Employee Code of Conduct:** The Company's code makes clear to employees the actions and behaviours expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and managing its supply chains.

6.4 **Recruitment/ Agency Workers Directive Policy:** The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

7.0 REVISIONS

7.1 This policy will be reviewed at such time as may be required, to ensure it remains relevant and appropriate to the aims and objectives of the business.

7.2 Revisions will be communicated to those affected by the changes.